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Attorneys for Defendants Digital Licensing Inc., Jason R. Anderson, Jacob S. Anderson, Schad E. Brannon, Roydon B. Nelson, and Relief Defendants Business Funding Solutions, LLC; Blox Lending, LLC; The Gold Collective LLC; and UIU Holdings, LLC

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

DIGITAL LICENSING INC. (d/b/a “DEBT
Box”), a Wyoming corporation, *et al.*,

Defendants,

**DEFENDANTS AND RELIEF
DEFENDANTS’ NOTICE OF REQUEST FOR
ORAL ARGUMENT ON PLAINTIFF
SECURITIES AND EXCHANGE
COMMISSION’S MOTION FOR
DISMISSAL OF THIS ACTION
WITHOUT PREJUDICE UNDER**

FED. R. CIV. P. 41(a)(2)

Case No. 2:23-cv-00482-RJS

Chief Judge Robert J. Shelby

ARCHER DRILLING, LLC, a Wyoming
limited liability company, *et al.*,

Relief Defendants.

Defendants DIGITAL LICENSING INC. (d/b/a “DEBT Box”), JASON R. ANDERSON, JACOB S. ANDERSON, SCHAD E. BRANNON, ROYDON B. NELSON, IX GLOBAL, LLC, JOSEPH A. MARTINEZ, BENAJMIN F. DANIELS, MARK W. SCHULER, B & B INVESTMENT GROUP, LLC (d/b/a “CORE 1 CRYPTO”), TRAVIS A. FLAHERTY, ALTON O. PARKER, BW HOLDINGS, LLC (d/b/a the “FAIR PROJECT”), and BRENDAN J. STANGIS and Relief Defendants BUSINESS FUNDING SOLUTIONS, LLC, BLOX LENDING, LLC, FLAHERTY ENTERPRISES, LLC, IX VENTURES FZCO, THE GOLD COLLECTIVE LLC, and UIU HOLDINGS, LLC., by and through their undersigned counsel, respectfully request oral argument on the pending Securities and Exchange Commission’s (“SEC”) Motion to Dismiss Without Prejudice Pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure (ECF No. 260).

The undersigned counsel of 20 Defendants and Relief Defendants submit that oral argument would assist this Court’s decisional process for resolving the SEC’s motion to dismiss.

DATED this 29th day of February 2024.

Respectfully submitted,

KUNZLER BEAN & ADAMSON, PC

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/s/ Richard Hong

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Roydon B. Nelson, and Relief Defendants Business Funding Solutions, LLC; Blox Lending, LLC; The Gold Collective LLC; and UIU Holdings, LLC

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/s/ Romaine C. Marshall*

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**Signed with permission given on 02/28/2024.*

CLYDE SNOW & SESSIONS

/s/ Keith M. Woodwell*

Keith M. Woodwell

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Attorneys for Benjamin F. Daniels, Mark W. Schuler, Alton O. Parker, B & B Investment Group, LLC, and BW Holdings, LLC d/b/a the "FAIR Project"

**Signed with permission given on 02/28/2024.*

PARSON BEHLE & LATIMER

/s/ Brent Baker*

Brent Baker

Attorney for Brendan J. Stangis

**Signed with permission given on 02/29/2024.*